

W. Scott Randolph
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August 18, 2000

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Ex Parte: Deployment of Wireline Services Offering Advanced Telecommunications
Capability – CC Docket No. 98-147; and Implementation of the Local
Competition Provisions in the Telecommunications Act of 1996 – CC Docket
No. 96-98**

Dear Ms. Salas,

Today, Donna Epps, Augie Trinchese, Karen Zacharia and the undersigned, representing Verizon Communications, met with Kathy Farroba, Jake Jennings, Jon Reel, and John Stanley of the Common Carrier Bureau; Jim Carr of the Office of the General Counsel; and Jerry Stanshine of the Office of Engineering and Technology. The purpose of the meeting was to discuss various issues raised in petitions for reconsideration related to line sharing and "line splitting". The attached material was used in the discussions.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, and original and one copy of this letter are being submitted to the Office of the Secretary. Please associate this notification with the record in the proceedings indicated above.

If you have any questions regarding this matter, please call me at (202) 463-5293.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Scott Randolph".

W. Scott Randolph
Director - Regulatory Matters

cc: Kathy Farroba
 Jake Jennings
 Jon Reel
 John Stanley
 Jim Carr
 Jerry Stanshine

LINE SPLITTING

- **CURRENT ARRANGEMENTS:**

Verizon does not preclude CLEC(s) from providing both voice and data over the same loop and combining that loop with Verizon provided combined unbundled switching and transport at a collocation arrangement. These elements are available under interconnection agreements and under tariffs.

One or more CLECs using DSL compatible loops and combined unbundled local switching and transport can provide a bundled voice and data service to their end user customer.

These arrangements are consistent with the FCC's Line Sharing Order.

UNE P is a combination of a loop, switching and transport unbundled network elements used to provide circuit switched voice service.

Line splitting, which requires the installation of a splitter, migrates a UNE P arrangement to an unbundled loop and unbundled switching / transport arrangement combined by a CLEC. If the loop is DSL compatible, this migration does **not** require the need for a different / new unbundled loop, assuming the existing loop is DSL compatible.

In addition, Verizon continues to work with CLECs in the NY DSL Collaborative to address additional / new business rules and potential modifications to existing offerings to facilitate further arrangements related to line splitting.

- **PERFORMANCE MEASURES**

Performance measures are available or are being developed in the states for unbundled loops and switching.

As new offerings and arrangements are negotiated, the applicable measures and standards are more appropriately developed on a state by state basis.

Verizon has committed to providing DSL services out of a separate advanced services affiliate and is currently providing DSL out of the separate affiliate in New York and Connecticut.

Network elements provided to the separate advanced services affiliates are subject to the same performance and non-discriminatory standards that apply to all non-affiliated carriers for the same elements.

- **COLLOCATION:**

Notwithstanding the recent Court Remand, Verizon permits CLECs to share collocation arrangements or to obtain services that provide or facilitate cross connecting between CLEC collocation arrangements.

- **PRICING:**

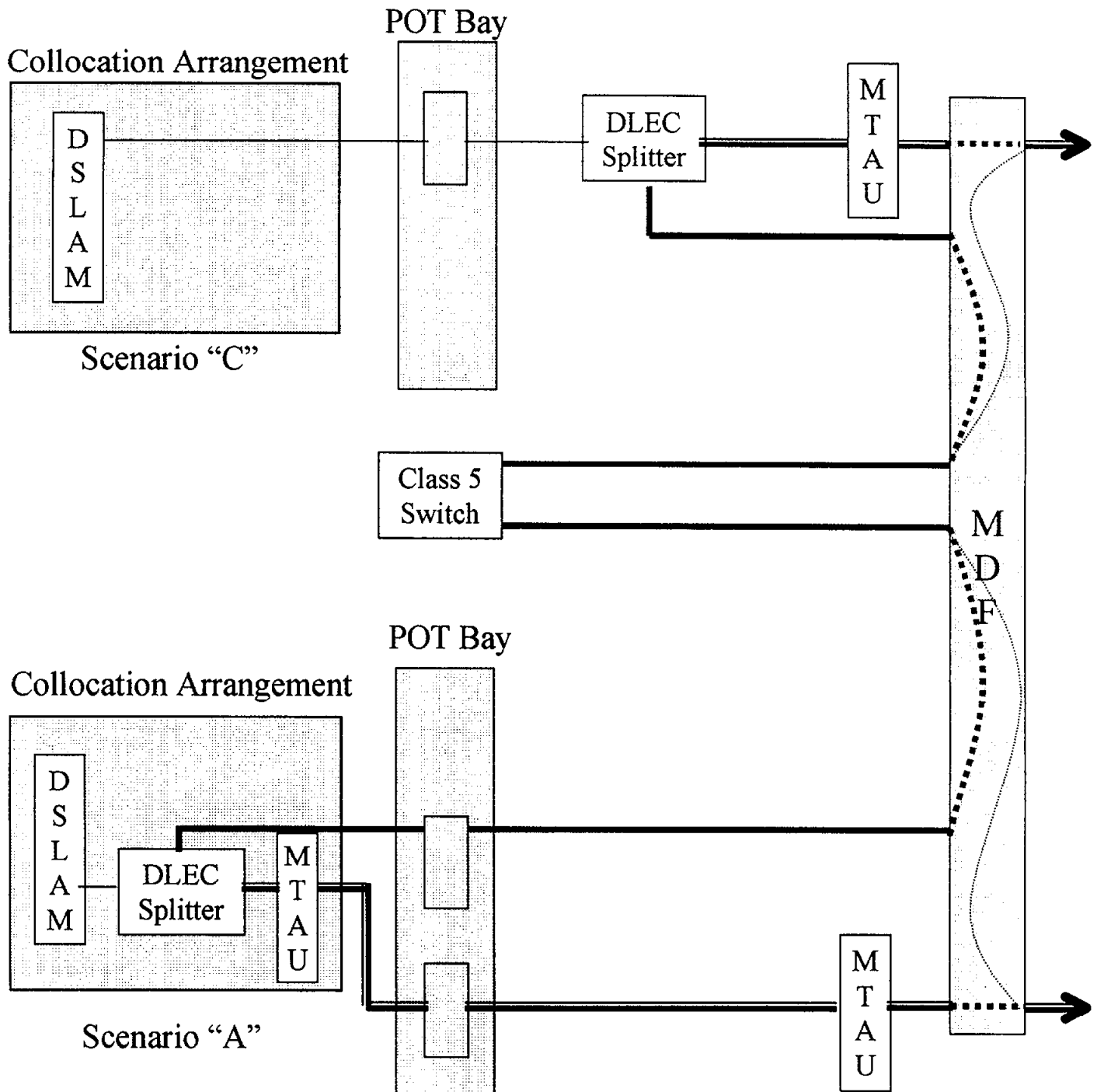
Prices are appropriately developed in state jurisdiction.

Prices for available UNEs, including those a CLEC needs to offer a combined voice and data service to its end user customers, exist in either interconnection agreements or tariffs.

- **UPCOMING 271 APPLICATIONS:**

Verizon will address all elements and offerings for which it has a legal and binding obligation to provide.

DSL Line Sharing Current Configuration



DSL Line Sharing AT&T Configuration

